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*Attorneys For Plaintiffs  
Nanya Technology Corp. and  
Nanya Technology Corp. U.S.A.*

**IN THE DISTRICT COURT OF GUAM**

NANYA TECHNOLOGY CORP. AND  
NANYA TECHNOLOGY CORP. U.S.A.,

Plaintiffs,

v.

FUJITSU LIMITED AND FUJITSU  
MICROELECTRONICS AMERICA, INC.,

Defendants.

Case No. CV-06-00025

**DECLARATION OF JOSEPH C.  
RAZZANO IN SUPPORT OF  
PLAINTIFF'S MOTION TO EXCEED  
NUMBER OF INTERROGATORIES AND  
REQUESTS FOR ADMISSIONS**

I, JOSEPH C. RAZZANO, hereby declare as follows:

1. My name is Joseph C. Razzano. I am over the age of 21 and am competent to make this Declaration.

2. All of the statements set forth herein are true and correct and are based on my personal knowledge.

3. I am an attorney of record for Plaintiffs, Nanya Technology Corporation and Nanya Technology Corp. U.S.A. ("Nanya" collectively herein) in the above-captioned and titled cause.

**FILED**

DISTRICT COURT OF GUAM

JAN 30 2007 mba

MARY L.M. MORAN  
CLERK OF COURT

ORIGINAL

4. Attached as Exhibit “A” are: (1) a true and correct copy of photographs of the One-Touch Ultra, the blood glucose monitoring system purchased by the Plaintiffs; (2) a true and correct copy of the receipt evidencing the purchase of the One Touch Ultra product on Guam on or about January 4, 2007; and (3) a true and correct copy of a Fujitsu advertisement touting the advantages of their “microcontrollers.”

5. Attached as Exhibit "B" is a true and correct copy of a Fujitsu press release regarding MOST car-infotainment product. In addition, attached hereto is a true and correct copy of **BMW** automobile materials provided by **BMW** and describing the MOST system used in **BMW** automobiles.

6. Attached as Exhibit "C" is a true and correct copy of a Fujitsu Microelectronics America, Inc. press release.

7. Attached as Exhibit “D” is a true and correct copy of a Fujitsu advertisement describing advantages of their microcontrollers for automotive applications.

8. Attached as Exhibit “E” is a true and correct copy of invoices and packaging materials evidencing that Defendants expressly ship their products to Guam. The invoices from Magnitude Electronics, LLC, located in Burlingame, California, were ordered and shipped directly to counsel in Guam.

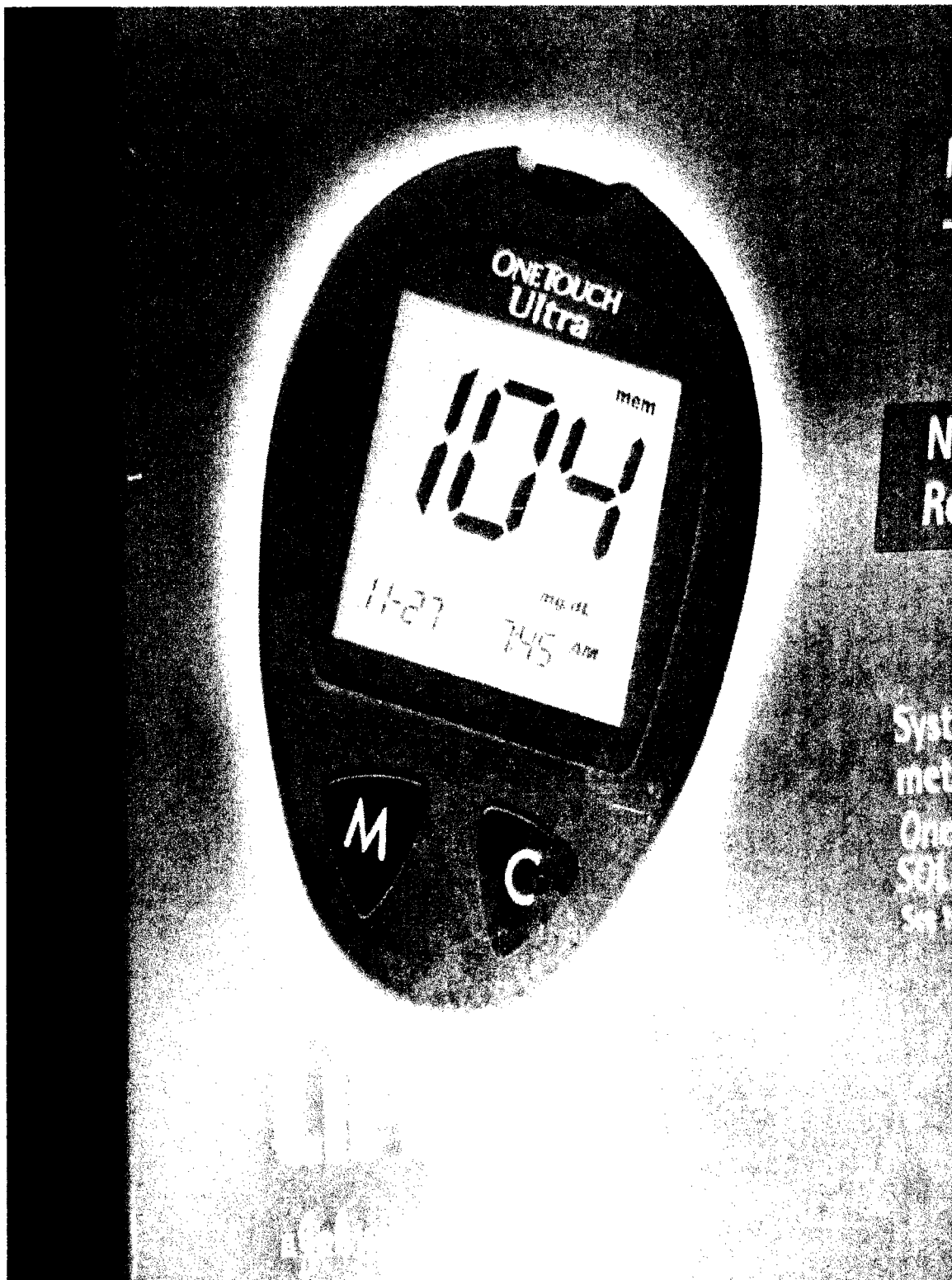
9. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on January 30, 2007.

  
JOSEPH C. RAZZANO

# **EXHIBIT A**

206



[illegible]



205

**Pay-Less Supermarkets Inc.**  
DEDECO - 432-939129419

PHARMACY - SCRIPTS MP 75.00  
YOUR BALANCE DUE IS 75.00  
CASH SALES 75.00  
CHANGE 00

YOUR APPROXIMATE GRT IS \$ 2.88

1/04/07 13:57 0001 10:0048 1115

THANK YOU FOR SHOPPING AT PAY-LESS  
\*\* PLEASE COME AGAIN \*\*

**OneTouch<sup>®</sup> Ultra<sup>®</sup>**  
**Blood Glucose Monitoring System**

**Of Control**

Less Blood  
Less Pain

No Waiting—Accurate  
Results In Just 5 Seconds

System includes  
meter and accessories  
OneTouch<sup>®</sup> Ultra<sup>®</sup> Test Strips  
SOLD SEPARATELY  
See top panel for details

**SAVE!**  
up to **\$60**

**LIFESCAN**  
a Johnson & Johnson company

# ONE TOUCH<sup>®</sup>

## Ultra<sup>™</sup>

Blood  
Glucose  
Monitoring  
System

The Comfort Of C

FASTDRAW<sup>™</sup>  
DESIGN

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- Test on
- ending
- UltraS
- painfu
- UltraS
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### Advanced Data Management

- Large, easy-to-read display
- 150-test memory with date and time
- Automatic 14 and 30-day averaging
- Can be downloaded into OneTouch<sup>™</sup> Diabetes Management Software for data graphing and trending †

\* Read the owner's booklet and talk to your doctor before arm testing.  
† OneTouch<sup>™</sup> Software or data cable not included.

3-Year Warranty.  
30-Day Money-Back Guarantee.

## Keep In Touch

We're always there, whenever you need us.

To make sure you're absolutely comfortable using OneTouch<sup>®</sup> products, we offer you 2 fast and easy ways to ask questions and get information.

- 1 24-Hour, Toll-Free Assistance  
USA (English): 1 800 227-8862 or USA (Español): 1 800 381-7226  
[www.LifeScan.com](http://www.LifeScan.com)

- 2 Or visit our award winning Web site for product information, answers by experts to frequently asked questions, diabetes management information, recipes, and personal e-mail support.

**LIFESCAN**

A Johnson & Johnson Company

**YES!** OneTouch<sup>®</sup>  
Test Strips  
are covered by most  
insurance plans and  
Medicare Part B  
Conditions and restrictions apply.  
Check your plan for details.

PAY-LESS SUPERMARKETS INC.  
DEDED0 - 632-9391/9419

PHARMACY - SCRIPTS NP 75.00  
YOUR BALANCE DUE IS 75.00  
CASH SALES 75.00  
CHANGE .00

YOUR APPROXIMATE GRT IS \$ 2.88

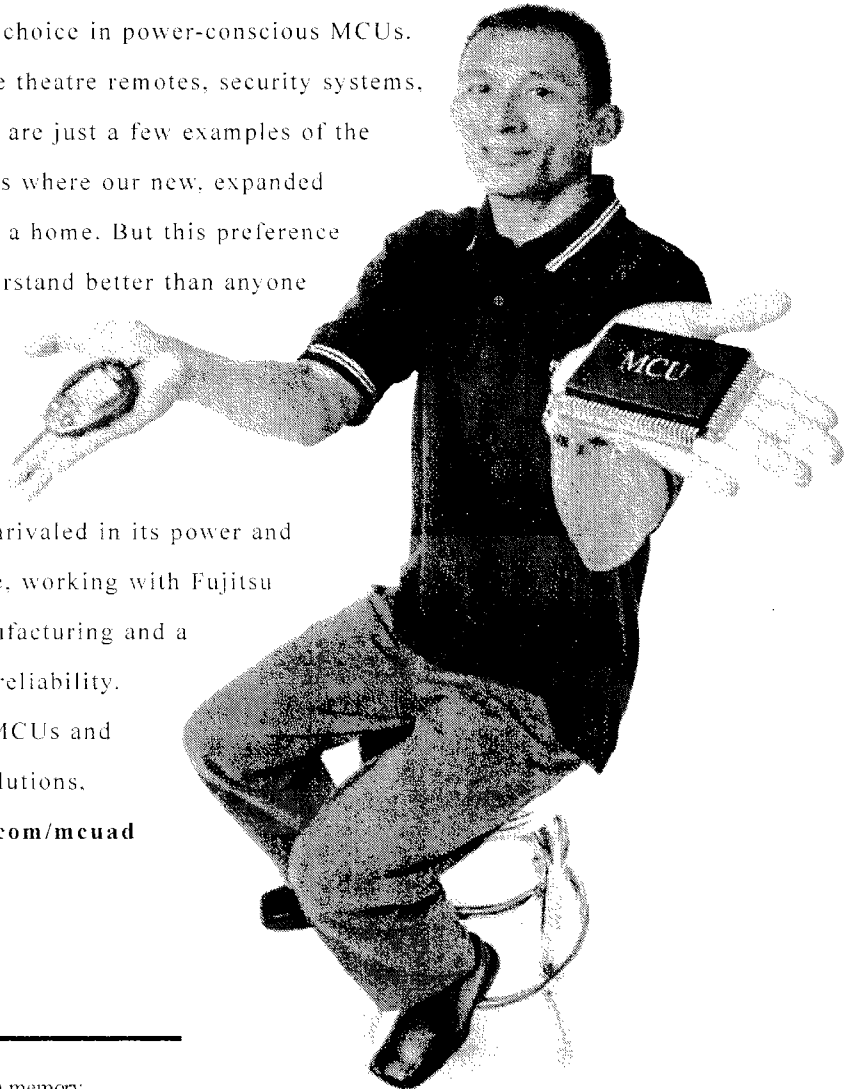
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## The real power behind Fujitsu's 8-bit MCUs is the fact they hardly use any.

Thanks to our low-voltage, low-leakage yet high-speed designs, Fujitsu is the preferred choice in power-conscious MCUs. Glucose monitors, home theatre remotes, security systems, and thermostat controls are just a few examples of the hundreds of applications where our new, expanded 8-bit MCUs have found a home. But this preference is no accident. We understand better than anyone the price, performance and space challenges faced by engineers, and the end result is a design architecture unrivaled in its power and flexibility. What's more, working with Fujitsu offers world-class manufacturing and a proven track record of reliability. For more on Fujitsu's MCUs and our industry-leading solutions, visit [www.fma.fujitsu.com/mcuad](http://www.fma.fujitsu.com/mcuad) or call (800) 866-8608.



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- Up to 5 channel UART
- Low-power modes
- DC/AC motor, inverter control modules
- Dedicated DSC application specific controllers
- LPC bus, PS2 interface, keyboard controller with multi Li-ion battery management
- A/D, D/A, LCD controllers/drivers and timers
- Full-featured ICE and integrated development environment available

*Bringing solutions to your business is Tu Lac,  
Technical Sales Manager for Fujitsu Microelectronics.*

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THE POSSIBILITIES ARE INFINITE

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